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Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments on Proposed Amendments to the Commercial Harborcraft Regulation

Dear Chair Randall and Members of the Board:

I'd like to thank the members of the Board for the opportunity to comment on the proposed Commercial Harbor Craft (CHC) regulation.

My company, Crimson Renewable Energy, is the largest producer of biodiesel in California, and for nearly a decade has consistently produced over 50% of all the biodiesel produced in California. We play a significant role in helping California and our customers decarbonize challenging transportation emission sectors such as heavy-duty trucking, rail, and agriculture and construction equipment. Crimson and the biodiesel industry can play similar role in her marine sector, to decarbonize and reduce harmful particulate matter and hydrocarbon emissions associated with Marine fuels.

As members of the Clean Fuels Alliance of America (formerly National Biodiesel Board) and the California Advanced Biofuels Alliance (CABA), we wish to align ourselves with the comments they have submitted as well as comments submitted by Renewable Energy Group Inc.

In particular, we would like to highlight one specific part of the proposed amendments to the Commercial Harbor Craft Regulation.

We are disappointed by the tenor and tone taken towards biodiesel within Appendix E section V(A) Biodiesel (page E52 – E54), especially in light of the fact that Air Resources Board has approved biodiesel for in-state usage for over a decade and has seen over 1.4 billion gallons come to California since 2011. Additionally, we find very problematic the factual mis-statements and outdated information contained in Appendix E. There is no evidence in existing scientific evidence that supports the claim made in Appendix E "...biodiesel, which is a methyl ester compound that should not be used in high quantities with retrofit aftertreatment." This language should be removed. Many, if not all, of the claims made about biodiesel are simply wrong and/or based upon outdated studies from 2006-2012 that are no longer relevant nor accurate in light of new data. Thus, we request that the section on biodiesel be deleted from Appendix E

Sincerely,

Harry Simpson
President and CEO
Crimson Renewable Energy, LLC
